

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF IOWA
WESTERN DIVISION**

**KARLA O'NELL NORAMBUENA
et al.,**

Plaintiffs,

vs.

**WESTERN IOWA TECH
COMMUNITY COLLEGE
(WITCC) et al.,**

Defendants.

CASE NO. 5:20-cv-4054-LTS-KEM

**JOINT STATUS REPORT
PURSUANT TO COURT'S ORDER
AT DCD 239**

COME NOW counsel for the Plaintiffs, on behalf of all parties, and for their joint status report pursuant to Court's Order at DCD 239, states as follows:

1. By agreement of the parties, the depositions of plaintiffs Bairon Morel Guerra, Claudio Ramos, and Carilyns Camus have been delayed while these plaintiffs have attempted to ensure their lawful admission to the United States for depositions. All other plaintiffs have been deposed, and the vast majority of defendants and defense witnesses have been deposed. Discovery continues to move forward.

2. After being denied the ability to participate in the Visa Waiver Program/ESTA, Plaintiff Claudio Ramos has applied for a B1/B2 visa. His visa fee has been paid, and his visa interview is scheduled at the U.S. Embassy in Santiago, Chile for February 21, 2024, at 11:15 a.m. (GMT).

3. After being denied the ability to participate in the Visa Waiver Program/ESTA, Plaintiff Bairon Morel Guerra has applied for a B1/B2 visa. His visa fee has been paid, and his visa interview is scheduled at the U.S. Embassy in Santiago, Chile for February 22, 2024, at 11:15 a.m. (GMT).

4. Plaintiff Carilyns Camus has been approved for the Visa Wavier Program.

5. Through counsel, the plaintiffs have been in contact with constituent services of Senator Chuck Grassley. Plaintiffs are creating contingency plans to contact the Embassy in Santiago as well as CBP at the point of entry for the Plaintiffs if necessary, to explain the reason for these plaintiffs to enter the United States. Counsel for the Plaintiffs cannot guarantee anyone's successful admission to the United States, but are working diligently to encourage successful admission to the United States.

6. The parties need to set a deposition date for Ms. Camus, and she will then book her tickets. The parties are actively discussing deposition dates for Ms. Camus.

7. Mr. Ramos and Mr. Guerra will hopefully have their visas approvals within 5 days of their interview date. Then, the parties will need to schedule the depositions and Plaintiffs will book their tickets.

8. The plaintiffs would agree, if necessary, to take these depositions after the close of the discovery deadline given the timing of the visa interviews.

9. The Plaintiffs are no longer pursuing a modification of the protective order to allow them to compare discovery with the companion case.

10. The parties respectfully suggest that a status conference is not necessary in light of the above. The parties suggest that the Court re-set the status conference for early March, which will allow counsel for plaintiffs to have further insight on Mr. Ramos and Mr. Guerra's ability to enter the United States.

WHEREFORE the Plaintiffs, on behalf of all parties, requests the Court accept this joint status report, reset the status conference for early March, and for any further relief deemed

necessary and just.

**PARRISH KRUIDENIER DUNN GENTRY
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ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on 2/12/2024, I electronically filed the foregoing with the Clerk of Court using the ECF system and a true copy of the foregoing was served either electronically or by U.S. First Class Mail upon the following:

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